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April 30, 2014

Via Hand Delivery and ECF

The Honorable Robert E. Gerber
United States Bankruptcy Court,
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: In re Motors Liquidation Company, et al. Case No. 09-50026 (REG)

Dear Judge Gerber:

This firm represents law offices of (i) Hilliard Muñoz Gonzales LLP; (ii) Thomas J. Henry Injury Attorney; (iii) Girard Gibbs LLP; and (iv) Jordan, Hyden, Womble and Culbreth, P.C., which in turn represent plaintiffs in *Brandt v. General Motors, LLC*, Civil Action No. 2:14-cv-00079 (S.D. Tex.) and *Silvas v. General Motors, LLC*, Case No. 2:14-cv-00089 (S.D. Tex.).

Pursuant to this Court's endorsed order dated April 22, 2014 [Docket No. 12627], we write to indicate our desire to be heard, if necessary, at the conference scheduled for May 2, 2014 (the "Conference"). We have conferred with the law firm of Brown Rudnick LLP, and other coordinating parties. It is our understanding that lead counsel for the Conference will be Edward Weisfelner of Brown Rudnick LLP. We expect that Mr. Weisfelner will address agenda issues pertinent to our clients' pleadings and positions during the Conference. We have requested that Mr. Weisfelner apprise the Court of our clients' reservation of rights as to certain issues. Specifically, in addition to the "threshold" issues to be identified by Mr. Weisfelner, we believe that an additional threshold issue for determination is whether the injunction contained in this Court's Sale Order applies to claims asserted by non-debtors against New GM based upon New GM's actions or inactions (and whether this Court has jurisdiction over such claims). Because a determination of the threshold issues to be raised by Mr. Weisfelner might obviate the need for this Court to address these latter issues, our clients are willing to put off their immediate consideration by the Court. Our clients, however, reserve the right to request a prompt determination of these matters to the extent a resolution of the threshold matters raised by Mr. Weisfelner take longer than anticipated. To the extent the foregoing reservation of rights is not asserted by Mr. Weisfelner in the manner we expect, we will make a short statement to the Court on this topic.

Respectfully submitted,

A handwritten signature in blue ink that reads "William P. Weintraub".
William P. Weintraub